

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
A Limited Liability Partnership  
Including Professional Corporations  
ORI KATZ, Cal. Bar No. 209561  
Four Embarcadero Center, 17th Floor  
San Francisco, California 94111-4109  
Telephone: 415.434.9100  
Facsimile: 415.434.3947  
E mail okatz@sheppardmullin.com

JENNIFER L. NASSIRI, Cal. Bar No. 209796  
ALEXANDRIA G. LATTNER, Cal. Bar No. 314855  
333 South Hope Street, 43rd Floor  
Los Angeles, CA 90071-1422  
Telephone: 213.620.1780  
Facsimile: 213.620.1398  
E-mail jnassiri@sheppardmullin.com  
alattner@sheppardmullin.com

Proposed Counsel to the Official Committee of  
Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SANTA ANA DIVISION**

In re:  
TRX HOLDCO, LLC, a Delaware limited  
liability company,  
Debtor and Debtor in Possession.

Case No.: 8:22-bk-10948-SC

Chapter 11 Case

In re:  
FITNESS ANYWHERE LLC, a Delaware  
limited liability company, dba TRX and TRX  
Training,  
Debtor and Debtor in Possession.

**NOTICE OF APPEARANCE AND  
REQUEST FOR SPECIAL NOTICE BY  
SHEPPARD, MULLIN, RICHTER &  
HAMPTON LLP ON BEHALF OF THE  
OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS**

[No Hearing Requested]

- ☒ Affects both Debtors  
☐ Affects TRX Holdco, LLC only  
☐ Affects Fitness Anywhere, LLC only

**TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES  
BANKRUPTCY JUDGE; THE OFFICE OF THE UNITED STATES TRUSTEE;  
COUNSEL TO THE DEBTORS, AND OTHER INTERESTED PARTIES:**

**PLEASE TAKE NOTICE** that Sheppard Mullin Richter & Hampton LLP, proposed counsel to the Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned bankruptcy case (the “Case”), hereby appears on behalf of the Committee and requests that all notices given or required to be given in this case whether given by the Court, TRX Holdco, LLC or Fitness Anywhere LLC, the debtors in possession in these chapter 11 cases (jointly, the “Debtors”), or any other party, and all pleadings or other papers served or required to be served in connection with any such matter, be served on proposed counsel for the Committee at the following addresses:

Sheppard, Mullin, Richter & Hampton LLP  
Four Embarcadero Center, 17th Floor  
San Francisco, CA 94111  
Attn: Ori Katz, Esq. .  
Phone: (415) 434-9100  
Facsimile: (415) 434-3947  
Email: okatz@sheppardmullin.com

Sheppard, Mullin, Richter & Hampton LLP  
333 South Hope Street, 43rd Floor  
Los Angeles, CA 90071  
Attn: Jennifer Nassiri, Esq.  
Alexandria G. Lattner, Esq.  
Phone: (213) 620-1780  
Facsimile (213) 620-1398  
Email: jnassiri@sheppardmullin.com  
alattner@sheppardmullin.com

In addition, pursuant to Bankruptcy Rule 2002(g), the Committee requests that the foregoing names and address be added to the Court’s master mailing list.

**PLEASE TAKE FURTHER NOTICE**, that neither this Notice of Appearance and Request for Special Notice (the “Notice”), nor any other appearances, pleadings, proofs of claim, claims, or suits filed by the Committee shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after *de novo* review by a United States District Court Judge, (ii) the right to trial by jury in any case, controversy or proceeding, (iii) the right to have the United States District Court withdraw the reference in any matter subject to mandatory or

1 discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any  
2 purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other rights,  
3 claims, actions, defenses, setoffs or recoupments as appropriate, in law or in equity, under any  
4 agreements, all of which right, claims, actions, defenses, setoffs and recoupments are expressly  
5 reserved.

6 The Committee expressly reserves and preserves all such rights without exception and with  
7 no purpose of confessing or conceding the jurisdiction or venue of the Court or venue of the case  
8 in any way by this filing.

9 Dated: June 29, 2022

10 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

11  
12 By

/s/ Jennifer Nassiri

ORI KATZ

JENNIFER NASSIRI

ALEXANDRIA LATTNER

[Proposed] Attorneys for Official Committee of  
Unsecured Creditors

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 333 South Hope Street, 43rd Floor Los Angeles, CA 90071

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) **in the manner stated below**:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) June 29, 2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Ron Bender rb@lnbyb.com

Shawn M Christianson cmcintire@buchalter.com, schristianson@buchalter.com

Michael I. Gottfried mgottfried@elkinskalt.com, cavila@elkinskalt.com

Jonathan Gottlieb jdg@lnbyg.com

Michael J Hauser on behalf of U.S. Trustee United States Trustee (SA)  
michael.hauser@usdoj.gov

Marsha A Houston mhouston@reedsmith.com, hvalencia@reedsmith.com

Krikor J Meshefejian kjm@lnbyg.com

Ali M Mojdehi amojdehi@btlaw.com,  
jgertz@btlaw.com;arego@btlaw.com;amattingly@btlaw.com

Christopher O Rivas crivas@reedsmith.com

Lindsey L Smith lls@lnbyg.com,

United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov

☐Service information continued on attached page.

### **2. SERVED BY UNITED STATES MAIL:**

On (*date*) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐Service information continued on attached page.

### **3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**

(*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (June 29, 2022), I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

### **SERVED BY OVERNIGHT MAIL**

Honorable Scott C. Clarkson  
U.S. Bankruptcy Court, Ronald Reagan Federal Building  
411 West Fourth Street  
Suite 5130  
Santa Ana, CA 92701-4593

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 29, 2022

Alexandria G. Lattner

/s/ Alexandria G. Lattner

*Date*

*Printed Name*

*Signature*